

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IRENE SIMMONS,	)	
	)	
Plaintiff,	)	
	)	Case No. 20-cv-00478
v.	)	
	)	
CITY OF CHICAGO; CHICAGO	)	
POLICE OFFICERS DAVID	)	
SALGADO, XAVIER ELIZONDO,	)	Judge John F. Kness
ROBERTO RAMIREZ, RICHARD	)	
MOSTOWSKI, LISA TORRES,	)	
ARNOLDO LUEVANO, MARCOS	)	
PEREZ, and UNKNOWN OFFICERS,	)	
	)	
	)	
Defendants.	)	

**JOINT REQUEST FOR SETTLEMENT REFERRAL**

Plaintiff and Defendants jointly request a referral to the assigned Magistrate Judge for a settlement conference, stating in support as follows:

1. Plaintiff and the City of Chicago have recently engaged in efforts to settle all of Plaintiff's claims against all Defendants in this case.
2. Based on their settlement efforts to date, which included a settlement demand from Plaintiff, a response from the City of Chicago, and a subsequent discussion among counsel, the parties are hopeful that this case can settle at this early stage.
3. The parties agree that a settlement conference with the assigned Magistrate Judge would be the best path forward toward settlement and therefore respectfully request a referral for a settlement conference.

Respectfully submitted by:

<p><u>/s/ Scott Rauscher</u>  <i>One of Plaintiffs' Attorneys</i>  Jon Loevy  Arthur Loevy  Scott Rauscher  Joshua Tepfer  Theresa Kleinhaus  Sean Starr  Loevy &amp; Loevy  311 North Aberdeen Street  Third Floor  Chicago, Illinois 60607  Phone: (312) 243-5900</p>	<p><u>/s/ Helen O'Shaughnessy</u>  Special Assistant Corporation Counsel for  Defendant City of Chicago    Avi Kamionski (akamionski@nklawllp.com)  Shneur Nathan (snathan@nklawllp.com)  Helen O'Shaughnessy (helen@nklawllp.com)  Natalie Adeeyo (nadeeyo@nklawllp.com)  Special Assistants Corporation Counsel  33 W. Monroe, Suite 1830  Chicago, IL 60603  (312) 612 1955</p>
<p><u>/s/ Larry S. Kowalczyk</u>  Special Assistant Corporation Counsel    Larry S. Kowalczyk-lkowalczyk@querrey.com  Megan Monaghan-mmonaghan@querrey.com  Querrey &amp; Harrow, Ltd.  Special Assistants Corporation Counsel  175 West Jackson Blvd., Suite 1600  Chicago, Illinois 60604-2827  (312) 540-7000  <i>Counsel for Defendant Officers Ramirez,  Treacy, Karczewski, Pacelli, Pardo, Nunez,  Utreras, McClain, and Hernandez</i></p>	<p><u>/s/ Kenneth M. Battle</u>  Special Assistant Corporation Counsel    Kenneth M. Battle  Winnefred A. Monu  Jessica Gomez-Feie  kbattle@mokblaw.com  wmonu@mokblaw.com  jgf@mokblaw.com  Special Assistants Corporation Counsel  20 North Clark Street., Suite 1600  Chicago, Illinois 60602  (312) 786-4600  <i>Counsel for Defendant Officer Xavier Elizondo</i></p>
<p><u>/s/ Whitney N. Hutchinson</u>  Special Assistant Corporation Counsel    Timothy P. Scahill –  tscahill@borkanscahill.com  Whitney N. Hutchinson –  whutchinson@borkanscahill.com  Andrew M. Cook – acook@borkanscahill.com  Borkan &amp; Scahill, Ltd.  Special Assistant Corporation Counsel  20 South Clark Street  Suite 1700  Chicago, Illinois 60603  (312) 580-1030  <i>Counsel for Defendant David Salgado</i></p>	<p><u>/s/ Kathryn M. Doi</u>  Special Assistant Corporation Counsel    Gary Ravitz, Special Assistant Corporation  Counsel (gravitz@daleymohan.com)  Eric S. Palles, Special Assistant Corporation  Counsel (epalles@daleymohan.com)  Kathryn M. Doi, Special Assistant Corporation  Counsel (kdoi@daleymohan.com)  DALEY MOHAN GROBLE, P.C.  55 E. Monroe Street, Suite 1600  Chicago, Illinois 60603  312-422-9999  <i>Counsel for Defendant Officer Richard  Mostowski</i></p>